

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	District Court Case No. 2-09CV-199-J
RALPH LYLE CRUM	§	(Appeal from Bankruptcy Case No.
	§	08-20297-RLJ-7)
Debtor	§	
	§	
RALPH LYLE CRUM	§	
	§	
Appellant	§	
vs.	§	
Kent Ries, Trustee and Randi Crum	§	
Appellees	§	
	§	

AGREED MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE JUDGE OF SAID COURT:


COMES NOW, Ralph Lyle Crum, Appellant herein, and joined by Appellees, and would show the court as follows:

1. Appellant and Appellees are in good faith negotiations to resolve all disputes in the appeal.
2. The parties agree that all parties (as well as the unsecured creditors in bankruptcy) would be best served by settlement, rather than expending fees from the bankruptcy estate to litigate the appeal.
3. The parties are in good faith negotiations to resolve the appeal, and believe that a settlement is likely, if appellate attorney's fees may be avoided by settlement.
4. The Appellant's brief is due Monday, August 31, 2009. An extension until September 22, 2009, should be adequate to complete the negotiations.

WHEREFORE, PREMISES CONSIDERED, Ralph Crum, Appellant, prays that the time to file Appellant's Brief be extended until September 22, 2009, and for such other relief to which he may be entitled at law or in equity.

Respectfully submitted,

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Attorney for Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that he has on the date shown below transmitted a true copy of the foregoing document to the following parties in interest by electronic notification via the court's electronic case filing system or by regular mail on the 27th day of August, 2009:

Kent D. Ries
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Chapter 7 Trustee

U. S. Trustee
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